



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

MKP/TH/MJL  
F.#2017R01840

*271 Cadman Plaza East  
Brooklyn, New York 11201*

April 3, 2019

By ECF

The Honorable Nicholas G. Garaufis  
United States District Judge  
United States District Court  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Keith Raniere, et al.  
Criminal Docket No. 18-204 (NGG) (S-2)

Dear Judge Garaufis:

The government respectfully requests the following changes to the revised questionnaire circulated by the Court to the parties yesterday evening:

- Question 42—the government objects to inclusion of the second sentence (“Many people have strong opinions on immigration.”) as unnecessary and imprecise and requests that it be stricken in its entirety. Alternatively, the government respectfully requests that “Many” be changed to “Some.”
- Question 53—the government has no objection to this question, but asks that the following corresponding catch-all question be added after Question 56: “Do you have any personal experiences where you were accused of something that would make it difficult for you to be an impartial juror in this case? Yes\_\_\_\_ No\_\_\_\_.” The cross-references in Questions 54 and 57 will also have to be adjusted accordingly.
- Question 61—the government objects to this question as it has no bearing on the case and improperly suggests government overreach.

- Question 76—the government submits that the follow-up question should be “if no please explain”

Respectfully submitted,

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cc: Clerk of the Court (NGG) (by ECF)  
Counsel of Record (by ECF)